

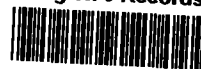


Roy F. Weston, Inc.
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6 June 1997

Mr. Paul Steadman, M.P.H.
U.S. EPA Region 5
77 West Jackson Boulevard
SE-5J
Chicago, IL 60604

EPA Region 5 Records Ctr.



247432

RE: Administrative Order of Consent: GH&R Foundry: Dayton, Ohio
Revised Work Plan

Dear Mr. Steadman:

This letter is to formally document our telephone conversation of 4 June 1997 regarding clarification of Section 2.2 of the Revised Work Plan (Work Plan, dated 19 May 1997). Section 2.2 of the Work Plan addresses specific concerns related to the safety of adjacent properties and preventing off site migration of soil and debris from the referenced site. The text outlines measures to be taken to mitigate vehicular migration of material from the site during the sampling and removal actions required by the Administrative Order of Consent. Specifically, this letter describes WESTON's approach to monitoring and preventing such migration in lieu of constructing and operating a truck-tire decontamination pad.

Field sampling and removal activities will be performed in such a manner as to prevent migration of debris and potential chemical contaminants from the site. All debris and/or waste materials in trucks and/or roll-off boxes leaving the site will be covered or sealed prior to departure. Each truck will be inspected prior to leaving the site by the WESTON Field Team Leader to ensure adherence to these measures and that all shipments are secure. The Detrick Street approach and site entryway will be periodically inspected during the day by the WESTON Field Team Leader to ensure that materials are not being transferred from the site to the roadway.

Temporary staging areas will be prepared for drums and transformers that are awaiting disposal. These areas will be constructed with temporary secondary containment measures in order to prevent liquids from leaking, spilling, or otherwise being released from the site during disposal preparation activities. This staging process will also provide a clean, paved surface for truck pick up, and thus prevent truck tires from tracking mud and loose debris from the site. Each truck will be inspected by the WESTON Field Team Leader prior to leaving the site to ensure that truck tires are not causing the migration of material from the site.

If the tires of vehicles traveling from the site during removal operations are observed to be causing migration of materials from the site, WESTON will take corrective action. The tires will





Mr. Paul Steadman
U.S. EPA, Region 5

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be rinsed free of potential chemical contaminants prior to leaving the site. Rinsate will be collected and tested for PCBs, and will be disposed of properly. Any liquids that may accumulate in these areas as a result of leaking containers will be collected, and disposed of properly. Regulated wastes will be removed by certified, experienced transporters, and will be disposed of in accordance with all federal, state and local regulations.

Implementation of these measures as necessary is expected to ensure the safety of the surrounding properties while permitting the effective and economic clean up and restoration of the GH&R Foundry site. If you have any questions regarding this submittal, please contact Michael May or me at (513) 825-3440.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in black ink, appearing to read "Bradford S. White". The signature is written in a cursive, flowing style.

Bradford S. White
Senior Project Manager
Ohio VAP Certified Professional

BSW/mpm

Enclosures

cc: Mr. Jeffrey Cahn/U.S.EPA Region 5
Mr. Raymond Carcione/Foundry Sales & Supply, Inc.
Mr. Aaron Bulloff, Esq./Kadish, Hinkel & Weibel
Mr. Tom Buchan/Ohio EPA
Mr. Douglas Hall/City of Dayton

USA Airbill

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BRAD WHITE

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MR PHIL STEADMAN AIR 353-7615

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